



Hilcorp Alaska, LLC

Ben Wasson  
Pipeline Risk and Compliance Manager  
Hilcorp Alaska, LLC

**Via Electronic Mail to: [Robert.Burrough@dot.gov](mailto:Robert.Burrough@dot.gov)**

May 13, 2022

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

**Re: Response to PHMSA Notice of Amendment  
CPF No. 1-2022-041-NOA**

Dear Mr. Burrough:

During the weeks of July 13 and August 10, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) performed a records and field inspection of the Hilcorp Alaska, LLC (Hilcorp) Kenai Gas Field (KGF), Swanson River Field (SRF), and Pretty Creek Unit (PCU) Natural Gas Storage fields.

As a result of the inspection, PHMSA issued a Notice of Amendment dated April 14, 2022, addressing three (3) apparent inadequacies within Hilcorp's plans or procedures related to the pipeline safety regulations in 49 C.F.R. Part 192.12, Underground Natural Gas Storage Facilities.

Hilcorp proactively manages the safety of our pipelines and underground natural gas storage facility (UNGSF) assets. Hilcorp also understands that improvements and enhancements are integral to the success of our programs. Such PHMSA inspections provide a valuable opportunity for such improvements.

The purpose of this letter and attached Response to Findings is to provide revised procedures for each of the three notices. It is Hilcorp's intent to comply with all PHMSA and other regulatory requirements, as well as to address any known findings/deficiencies when identified by PHMSA.

Sincerely,

Ben Wasson  
Pipeline Risk and Compliance Manager  
Hilcorp Alaska, LLC

**ATTACHMENTS:**     ATTACHMENT 1: Response to Findings  
                             ATTACHMENT 2: UNGSF OMER Section 7.4, Well Integrity Monitoring  
                             ATTACHMENT 3: UNGSF Comprehensive Risk Assessment Model  
                             ATTACHMENT 4: UNGSF OMER Section 7.2, Risk Management Process  
                             ATTACHMENT 5: SRF EAP, Section 11, Third-party Emergencies & Equipment Failure